

Appointment

From: King, Melanie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B9C6F7BDBBE740DA89B63C967C89E75D-MKING04]
Sent: 3/25/2022 8:40:12 PM
To: King, Melanie [King.Melanie@epa.gov]; Dholakia, Umesh [Dholakia.Umesh@epa.gov]; Willard, Erin [Willard.ErinM@epa.gov]; Watson, Marion [Watson.Marion@epa.gov]; Weir, Bridget [weir.bridget@epa.gov]; jamesmccarthy@comcast.net
CC: Peter, David [peter.david@epa.gov]; Honda, Gregory [honda.gregory@epa.gov]; Ayres, Sara [Ayres.Sara@epa.gov]; McGinn, Kevin [mcginn.kevin@epa.gov]; Lancey, Susan [lancey.susan@epa.gov]; Patel, Manojkumar [patel.manojkumar@epa.gov]; North, Alexis [North.Alexis@epa.gov]; Beckham, Lisa [BECKHAM.LISA@EPA.GOV]; Glass, Geoffrey [GLASS.GEOFFREY@EPA.GOV]; LaVigna, Gaetano [LaVigna.Gaetano@epa.gov]; Richard Kan [Kan.Richard@epa.gov]; Patel, Harish [Patel.Harish@epa.gov]; Sansevero, Christine [Sansevero.Christine@epa.gov]; Fortescue, Darren [Fortescue.Darren@epa.gov]; 'Trent, James R' [James_Trent@kindermorgan.com]; 'Butero, Carol' [Carol_Butero@kindermorgan.com]; 'Mitchell, Tom' [Tom_Mitchell@kindermorgan.com]; 'carmen.planells@southernstar.com' [Carmen.Planells@southernstar.com]; 'Hendricks, Katrin' [Katrin.Hendricks@southernstar.com]; 'mark.gebbia@williams.com' [mark.gebbia@williams.com]; 'Hahn, Michael' [Michael.Hahn@williams.com]; 'cmiller@cameronlng.com' [cmiller@cameronlng.com]; 'John Wainwright' [jwainwright@cameronlng.com]; 'David.Nickel@bwpipelines.com' [David.Nickel@bwpipelines.com]; 'David Ayers' [David.Ayers@cheniere.com]; 'Paul Newman' [Paul.Newman@cheniere.com]; 'David Felcman' [david1_felcman@tcenergy.com]; Shrishti Chhabra [shrishti_chhabra@tcenergy.com]; 'Emily Emmons' [EmmonsE@natfuel.com]; 'EnnisJ@natfuel.com' [EnnisJ@natfuel.com]; 'Leslie Witherspoon' [Witherspoon_Leslie_H@solarturbines.com]; Jeffrey Panek [japanek@ameritech.net]
Subject: Web Meeting to Discuss Monitoring Petition "Template" for Subpart YYYY Turbines
Location: Microsoft Teams Meeting
Start: 4/5/2022 5:00:00 PM
End: 4/5/2022 6:30:00 PM
Show Time As: Busy

Required Attendees: King, Melanie; Dholakia, Umesh; Willard, Erin; Watson, Marion; Weir, Bridget; jamesmccarthy@comcast.net
Optional Attendees: Peter, David; Honda, Gregory; Ayres, Sara; McGinn, Kevin; Lancey, Susan; Patel, Manojkumar; North, Alexis; Beckham, Lisa; Glass, Geoffrey; LaVigna, Gaetano; Richard Kan; Patel, Harish; Sansevero, Christine; Fortescue, Darren; 'Trent, James R'; 'Butero, Carol'; 'Mitchell, Tom'; 'carmen.planells@southernstar.com'; 'Hendricks, Katrin'; 'mark.gebbia@williams.com'; 'Hahn, Michael'; 'cmiller@cameronlng.com'; 'John Wainwright'; 'David.Nickel@bwpipelines.com'; 'David Ayers'; 'Paul Newman'; 'David Felcman'; Shrishti Chhabra; 'Emily Emmons'; 'EnnisJ@natfuel.com'; 'Leslie Witherspoon'; Jeffrey Panek

Update, adding Jim McCarthy to the invitation. Meeting call-in info is at the bottom for anyone that can't use Teams.

Following up on my email on 3/24. See below, Jim said that Regions 2, 3, 4, and 6 were key. I realize I won't find a time that everyone can make on such short notice but hopefully we can have critical mass and we can follow up with those that can't make this time. Feel free to forward to anyone else that should be included.

From: jamesmccarthy@comcast.net
Sent: Friday, March 25, 2022 4:15 PM
To: King, Melanie
Subject: Web Meeting to Discuss Monitoring Petition "Template" for Subpart YYYY Turbines

Melanie,

Thank you for your time this week. In our Wednesday call, I requested EPA support for a web meeting to discuss developing a Turbine NESHAP "Monitoring Petition Template" that could be used by companies operating natural gas-fired turbines that utilize combustion-based emissions control to meet the Subpart YYYY standard. This email is to memorialize our call, and request a meeting with EPA to discuss the Monitoring Petition. My company, IES Inc., is working with several natural gas transmission pipeline / LNG companies to hopefully expedite the process for submitting monitoring petitions required by Subpart YYYY, as well as EPA's review and approval of the plans.

As you know, if a Subpart YYYY turbine is not equipped with an oxidation catalyst, the operator is required to petition the Administrator for operating limits that will be monitored continuously [per §63.6120(e) and §63.6125(b)], with the Petition including the elements in §63.6120(f). We would like to discuss the content and elements of the Petition, and provide a template for EPA review and comment in order to facilitate development of a document that can be used by companies to submit facility-specific petitions. With EPA's assistance, we hope to expedite this process so that approved monitoring is in place as soon as possible and prior to the initial performance test.

A proposed meeting agenda, initial outline for the Monitoring Petition Template, and candidate dates and times for a web meeting follow. Per your request regarding EPA regional offices, several key EPA regions are identified below.

1. Draft Agenda - Meeting on Turbine NESHAP Monitoring Petition for Combustion-Based Turbine Compliance

- Introductions – EPA, operators, and OEM(s)
- Objective – Develop Turbine NESHAP Monitoring Petition template to expedite / streamline EPA review and approval
- Review turbine technology (combustion-based) and petition requirements
- Review Draft Outline of Petition Template
- Discussion on petition content and EPA advice on how to proceed
- Next steps – Schedule for submittal of Petition Template and group follow-up meeting with EPA

Schedule provides limited time for monitoring petition submittal and approval prior to the initial performance test deadline (no later than September 5) and initial test notification deadline (60 days prior or no later than July 7 for a September 5 test)

2. Draft Outline for Petition: The outline below is based on the 5 items in §63.6120(f)

Turbine NESHAP Parameter Monitoring Petition per §63.6125(b)

- Turbine technology overview and Subpart YYYY monitoring requirements
- Parameter selection and rationale, including operating range

Basis for operating range

- Parameter instrumentation, specifications and QA/QC

2. The following dates are proposed and hopefully one is amenable to EPA. Please let me know if another date or time is preferred. We propose a 90 minute meeting to ensure adequate time is available..

- April 4 (Mon): 10:00 am – 11:30 am eastern or 2:00 – 3:30 eastern
- April 5 (Tues): 10:00 am – 11:30 am eastern or 1:00 – 2:30 eastern
- April 7 (Thur): 10:00 am – 11:30 am eastern or 2:00 – 3:30 eastern

3. You noted that EPA internal outreach would include all regional offices, but it would be helpful if several key regions could be identified for this initial web meeting. While units are located throughout the continental U.S., key Regional Offices include Regions 2, 3, 4 and 6.

The information in this email has been discussed with the operators / OEM that IES Inc. is working with, and we look forward to scheduling a meeting. A list of planned meeting attendees will be provided, and I look forward to hearing about EPA participants.

Thank you for your assistance, and I look forward to getting a web meeting scheduled and making progress on this endeavor. Please call or email if you have any questions or would like to discuss this further.

Jim McCarthy

Innovative Environmental Solutions, Inc.

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